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Austin, TX 78731-4280
Phone: 512.343.2544
Fax: 512.343.0119

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

June 25, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT** – *Connect America Fund*, WC Docket No. 10-90;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Chickasaw Telephone Company (“Chickasaw” or “the Company”), Study Area Code 431980, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission’s rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC’s November 16, 2012 *Protective Order* in WC Docket No. 10-90 *et al.* These attachments contain competitively sensitive data that Chickasaw maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

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Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Chickasaw requests that the text and data extracted from its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's access line counts, existing broadband capabilities, and its network investment plans through 2019 that will improve service quality for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains granular information on the Company's access line counts and existing broadband capabilities as well as detailed plans for financial investments in its network through 2019 to improve service to subscribers. This is closely guarded, privileged information that the Company does not make publicly available.

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- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider such as a larger cable company, who will typically seek to “cherry pick” the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company’s access line count, its existing broadband capabilities, and its strategic plans for network investments. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. Although the information reflects the Company’s service improvement plans for a five year period, it would provide a very useful baseline for competitors for several years beyond that period.

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- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Chickasaw seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, *et al.*¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Chickasaw is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

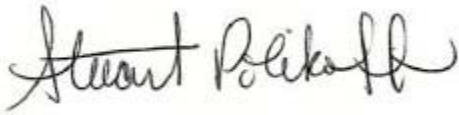
¹ *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, *Protective Order*, DA 12-1857 (rel. Nov. 16, 2012).

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This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,



Stuart Polikoff
Authorized Representative for
Chickasaw Telephone Company

SP/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau,
Federal Communications Commission, (2 hardcopies of non-redacted submission)

Mr. Larry D. Jones, Chickasaw Telephone Company

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	431980
<015> Study Area Name	CHICKASAW TEL CO
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Larry D. Jones
<035> Contact Telephone Number: Number of the person identified in data line <030>	5806225223 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	ldjones@chickasawphone.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 5px;">431980ok510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 5px;">431980ok610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 5px;">431980ok1010.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

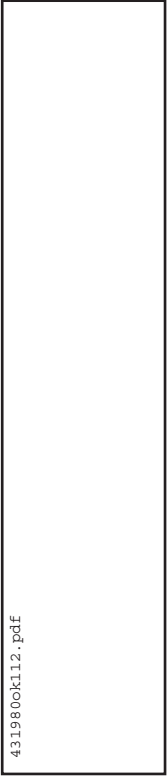
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Larry D. Jones 5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net
<110>	Has your company received its ETC certification from the FCC?	<input type="radio"/> (yes / no) <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

**(200) Service Outage Reporting (Voice)
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

[illegible]

(900) Tribal Lands Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
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<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

<910>	Tribal Land(s) on which ETC Serves	Chickasaw Nation Tribe
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<920>	Tribal Government Engagement Obligation	431980ok920.pdf	Name of Attached Document
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If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Select (Yes, No, NA)
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

(1100) No Terrestrial Backhaul Reporting

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

☐

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	580625223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>431980ok1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Certification
<2013>	2014 Frozen Support Certification
<2014>	2015 Frozen Support Certification
<2015>	2016 and future Frozen Support Certification
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband
Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification
<2018>	5th year Broadband Service Certification
<2019>	Interim Progress Certification
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021>	Interim Progress Community Anchor Institutions
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Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	580625223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)

Progress Report on 5 Year Plan

Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3011)

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012)

Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013)

Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

(3014)

If yes, does your company file the RUS annual report

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017)

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(Yes/No)

(3018)

If the response is no on line 3014, Is your company audited?

(Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021)

Management letter issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023)

Underlying information subjected to a review by an independent certified public accountant

(3024)

Underlying information subjected to an officer certification.

(3025)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

431980ck3026.pdf, 431980ck3026.xls

Name of Attached Document Listing Required Information

(3026)

Attach the worksheet listing required information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	431980
<015> Study Area Name	CHICKASAW TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035> Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Stuart Polikoff</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Stuart Polikoff</u>
Name of Reporting Carrier:	<u>CHICKASAW TEL CO</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/25/2014</u>
Printed name of Authorized Officer:	<u>Larry Jones</u>
Title or position of Authorized Officer:	<u>Vice President</u>
Telephone number of Authorized Officer:	<u>5806225223 ext.</u>
Study Area Code of Reporting Carrier:	<u>431980</u> Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>CHICKASAW TEL CO</u>
Name of Authorized Agent or Employee of Agent:	<u>Stuart Polikoff</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/25/2014</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Stuart Polikoff</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Senior Director - Business Compliance</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5126527730 ext.</u>
Study Area Code of Reporting Carrier:	<u>431980</u> Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431980
<015>	Study Area Name	CHICKASAW TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Larry D. Jones
<035>	Contact Telephone Number - Number of person identified in data line <030>	5806225223 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ldjones@chickasawphone.net
<810>	Reporting Carrier	Chickasaw Telephone Company
<811>	Holding Company	Chickasaw Holding Company
<812>	Operating Company	Chickasaw Telephone Company

[illegible]

LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

Following is the initial five-year service quality improvement plan for Chickasaw Telephone Company (“Chickasaw” or “the Company”) pursuant to 47 C.F.R. § 54.202(a)(1)(ii) that requires an eligible telecommunications carrier (ETC) to describe proposed improvements or upgrades to the ETC’s network throughout its service area. The *USF/ICC Transformation Order* establishes a public interest obligation for rate-of-return ETCs to provide broadband service at speeds of at least 4 Mbps downstream and 1 Mbps upstream (4:1) “upon reasonable request.” A service quality improvement plan cannot project where in the service area reasonable requests will be made. However, the proposed service improvements in this plan result in the availability of greater broadband speeds and capacity than is currently available.

Although this plan is a good faith effort by the Company, it is subject to change, given the uncertainty faced by ETCs regarding whether capital investments will be recoverable over the five year planning horizon. Factors that may affect the capital improvements plan include erosion of the customer base due to competition, alternative technologies, economic conditions in the service area, and unpredictable changes in the universal service support amounts an ETC receives.

Chickasaw owns and operates nine exchanges serving subscribers in south central Oklahoma. The service area includes portions of Carter, Garvin, Johnston, Love, McClain, and Murray counties. This service area covers approximately 617 square miles.

Baseline Network Description



Table 1 – Current Broadband Capabilities

Exchange Name	Total Square Miles	Total Existing Access Lines	Estimated Total Population Served	% Broadband Capable
[Redacted Table Content]				

2014 – 2019 Service Quality Improvement Plan

Table 2 provides Chickasaw’s intended service quality improvements and associated capital expenditures for 2014 – 2019, by exchange, along with estimates of the population that will be served by the improvements.

Table 2 – Service Quality Improvement Plan

Exchange	Description of Improvement	2014	2015	2016	2017	2018	2019	Estimated Population Served by Improvements
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Narrative Description: 2014 – 2015



Exchange Level Improvements



System Level Improvements



Narrative Description: 2016 – 2019



LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Chickasaw Telephone Company (“the Company”) complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Company operates are outlined in its local exchange services tariff, which is approved by the Oklahoma Corporation Commission (“OCC”). The tariff contains provisions regarding the Company’s customer service and protection practices.

Service quality standards for voice service are established by the OCC. The Company consistently meets or exceeds those standards and provides reports to the OCC, in accordance with the OCC’s rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a “best effort” service and are dependent upon a number of variables, many of which are outside the control of the Company.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the following consumer best practices: (1) the Company discloses its rates and terms of service to customers; (2) the Company provides specific disclosures in its advertising; (3) the Company separately identifies carrier charges from taxes on its billing statements; (4) the Company provides ready access to customer service; (5) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC’s Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company’s compliance with CPNI rules and a description of the Company’s operating procedures that ensure compliance are filed annually with the FCC.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Chickasaw Telephone Company (“the Company”) is able to function in emergency situations for both voice and broadband service. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, and mobile generators are at strategic locations to be deployed as needed to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The Company is able to reroute traffic around damaged facilities. Although the Company’s ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

LINE 920 – TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

Chickasaw Telephone Company (“the Company”) provides communications services to tribal members of the Chickasaw Nation (“the Nation”), as well as services to the Nation itself. The Company has a very good working relationship with the Nation and engages in regular monthly meetings with Clifford Agee, the Nation’s Assistant Secretary of Commerce, and his technology staff.

The purpose of these monthly meetings is to confirm that the Company is meeting all of the Nation’s expectations and to plan and prepare for any future service requirements. Among other things, these meetings have included discussions on the following topics:

- Needs assessment and deployment planning with a focus on the Nation’s community anchor institutions.
- Feasibility and sustainability planning.
- Marketing services in a culturally sensitive manner.
- Compliance with rights of way processes.
- Compliance with land use permitting requirements.
- Compliance with facilities siting rules.
- Compliance with environmental review processes.
- Compliance with cultural preservation review processes.
- Compliance with the Nation’s business and licensing requirements.

The Company is very proud of its relationship with the Nation and works hard to help the Nation prosper.

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$46.96, which includes the federal subscriber line charge ("SLC").¹

In all of the exchanges served by Chickasaw Telephone Company ("the Company"), the single-line residential local rate is \$14.00. When the federal SLC (\$6.50) and the state universal service fee (\$.09) are included, the rate becomes \$20.59. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$46.96.

¹ *Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply With New Rate Floor*, WC Docket No. 10-90, DA 14-384 (rel. Mar. 20, 2014), p. 2.

LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

All of the exchanges served by Chickasaw Telephone Company, Inc. (“the Company”) are Tribal lands. In all of the Company’s exchanges, residential customers who qualify for the Lifeline Program receive a discount of \$19.50 on local voice telephony service (\$9.25 federal discount + additional \$9.08 federal discount + \$1.17 state discount).

In all of the Company’s exchanges, the Lifeline single-line residential rate, including the federal SLC, is \$1.00 (\$20.50 standard rate - \$19.50 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within their local calling area.

Toll charges for calls outside of the local calling area are determined by the long distance carrier of the customer’s choosing. Lifeline customers may elect to subscribe to toll blocking at no charge.

The Company offers bundled services to Lifeline customers that are discounted by \$19.50 for the voice component of the bundle.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at <http://www.chickasawphone.com/lifeline.html>.

CHICKASAW TELEPHONE COMPANY
FINANCIAL STATEMENTS
WITH INDEPENDENT AUDITORS' REPORTS

Years Ended December 31, 2013 and 2012

CHICKASAW TELEPHONE COMPANY

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Independent Auditor's Report

The Stockholder and Board of Directors
Chickasaw Telephone Company

We have audited the accompanying financial statements of Chickasaw Telephone Company, which comprise the balance sheets as of December 31, 2013 and 2012, and the related statements of operations, stockholder's equity, and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

The Stockholders and Board of Directors
Chickasaw Telephone Company

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Chickasaw Telephone Company as of December 31, 2013 and 2012, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Santain Fischler & Co

Tulsa, Oklahoma
June 11, 2014

CHICKASAW TELEPHONE COMPANY**BALANCE SHEETS**

<i>December 31,</i>	2013	2012
---------------------	-------------	-------------

ASSETS**Current Assets:**

Cash and cash equivalents

Accounts Receivable:

Due from customers, no allowance
for doubtful accountsAccounts receivable - other, less allowance for
doubtful accounts of \$ [REDACTED] in 2013 and
\$ [REDACTED] in 2012

Accounts receivable - affiliates

Inventory

Deferred income tax assets

Other

Total Current Assets**Fixed Assets, at cost**

Accumulated depreciation

Net Fixed Assets**Other Noncurrent Assets:**

Cash surrender value life insurance

Other

Total Other Noncurrent Assets

\$

\$

The accompanying notes are an integral part of the financial statements.

2013

2012

LIABILITIES AND STOCKHOLDER'S EQUITY**Current Liabilities:**

Accounts payable and accrued liabilities

Current maturities of long-term debt

Other current liabilities

\$

Total Current Liabilities**Long-Term Debt**, net of current maturities**Other Liabilities:**

Deferred income tax liabilities

Total Liabilities**Stockholder's Equity:**

Common stock

Additional paid-in capital

Retained earnings

Total Stockholder's Equity

\$

CHICKASAW TELEPHONE COMPANY

STATEMENTS OF OPERATIONS

Years Ended December 31,

2013

2012

Operating Revenue:

Local service
Access and long-distance service
Miscellaneous

\$

Total Operating Revenue:**Operating Expenses:**

Plant specific
Plant nonspecific:
 Depreciation and amortization
 Network and other
Customer operations
Corporate operations
Operating taxes

Total Operating Expenses:**Net Operating Loss****Interest and Dividend Income****Gain on insurance benefits received****Gain on Sale of Other Assets****Interest Expense****Net Loss Before Income Taxes****Income Tax Benefit****Net Loss**

\$

The accompanying notes are an integral part of the financial statements.

CHICKASAW TELEPHONE COMPANY

STATEMENTS OF STOCKHOLDER'S EQUITY

Years Ended December 31, 2013 and 2012

	Common Stock	Additional	Retained	Total
	Shares	Paid-In	Earnings	Stockholder's
	Amount	Capital		Equity
Balance, December 31, 2011				
Net loss				
Declaration of dividends				
Balance, December 31, 2012				
Net loss				
Declaration of dividends				
Balance, December 31, 2013				

The accompanying notes are an integral part of the financial statements.

CHICKASAW TELEPHONE COMPANY**STATEMENTS OF CASH FLOWS**

<i>Years Ended December 31,</i>	2013	2012
---------------------------------	-------------	-------------

Cash Flows from Operating Activities:

Net loss

\$

Adjustments to reconcile net loss to net cash
provided by operating activities:

Depreciation and amortization

Gain on sale of other assets

Changes in assets and liabilities:

Accounts receivable

Inventory

Other assets

Accounts payable and accrued liabilities

Other liabilities

Deferred income taxes

Net Cash Provided by Operating Activities**Cash Flows from Investing Activities:**

Proceeds from sale of other assets

Additions to fixed assets

Net Cash Used in Investing Activities**Cash Flows from Financing Activities:**

Principal payments on long-term debt

The accompanying notes are an integral part of the financial statements.

	2013	2012
Increase (Decrease) in Cash and Cash Equivalents	\$	
Cash and Cash Equivalents , beginning of year		
Cash and Cash Equivalents , end of year	\$	
Disclosures on Noncash Investing Activities		
Fixed asset additions included in accounts payable	\$	
OTHER DISCLOSURES		
Interest paid	\$	

CHICKASAW TELEPHONE COMPANY
NOTES TO FINANCIAL STATEMENTS
YEARS ENDED DECEMBER 31, 2013 AND 2012

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES



CHICKASAW TELEPHONE COMPANY
NOTES TO FINANCIAL STATEMENTS
YEARS ENDED DECEMBER 31, 2013 AND 2012



2. FIXED ASSETS

Fixed assets consist of the following at December 31:

	<u>2013</u>	<u>2012</u>
Regulated Fixed Assets:		
Land		
Buildings		
Network facilities		



CHICKASAW TELEPHONE COMPANY
NOTES TO FINANCIAL STATEMENTS
YEARS ENDED DECEMBER 31, 2013 AND 2012

Vehicles and work equipment
 Furniture, fixtures and equipment
 Total Regulated Fixed Assets
 Nonregulated Fixed Assets:
 Land
 Buildings
 Furniture, fixtures and equipment
 Total Nonregulated Fixed Assets
 Telephone Plant Under Construction
 Total Fixed Assets

\$	
\$	

3. LONG-TERM DEBT

Long-term debt consists of the following at December 31:

	<u>2013</u>	<u>2012</u>
Company allocation of CoBank loan	\$	
Less current maturities		
	\$	

Future maturities of long-term debt are as follows for the years ending December 31:

2014	
2015	
2016	
Total	\$

CHICKASAW TELEPHONE COMPANY
NOTES TO FINANCIAL STATEMENTS
YEARS ENDED DECEMBER 31, 2013 AND 2012



4. COMMON STOCK



5. EMPLOYEE BENEFIT PLANS



CHICKASAW TELEPHONE COMPANY

NOTES TO FINANCIAL STATEMENTS

YEARS ENDED DECEMBER 31, 2013 AND 2012

6. INCOME TAXES

Income tax benefit consists of the following for the years ended December 31:

	<u>2013</u>	<u>2012</u>
Current tax benefit		
Deferred tax (expense) benefit		

The provision for income taxes differs from the amount computed at the Federal Statutory rate primarily due to nontaxable increases in cash surrender value of officer life insurance.

The components of deferred income tax assets and liabilities are as follows:

	<u>2013</u>	<u>2012</u>
Deferred tax assets:		
Allowance for doubtful accounts		
Other		
Total deferred tax assets		
Deferred tax liabilities:		
Fixed assets		
Net deferred tax liability		

7. RELATED PARTY TRANSACTIONS

8. REVENUE SETTLEMENT ADJUSTMENTS

CHICKASAW TELEPHONE COMPANY
NOTES TO FINANCIAL STATEMENTS
YEARS ENDED DECEMBER 31, 2013 AND 2012



9. RISKS AND UNCERTAINTIES



10. ACCOUNTING FOR UNCERTAIN TAX POSITIONS



CHICKASAW TELEPHONE COMPANY
NOTES TO FINANCIAL STATEMENTS
YEARS ENDED DECEMBER 31, 2013 AND 2012



11. COMMITMENTS AND CONTINGENCIES



12. OTHER

